



Brooke Payton
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February 10, 2025

VIA ECF

Magistrate Judge Daniel J. Stewart
United States District Court for the Northern District of New York
Federal Building and Courthouse
P.O. Box 7367
Syracuse, New York 13261

RE: [Jane Doe v. St. Lawrence University et al., Case No.: 8:23-cv-00426 \(BKS\) \(DJS\)](#)

Dear Judge Stewart,

We represent Plaintiff Jane Doe in connection with her claims against Defendants St. Lawrence University and Ernesto Moralez in the above-referenced action. Together with Defendants, we respectfully request an extension of time for the close of discovery. Discovery is currently scheduled to close on February 28, 2025. The Parties do not anticipate being able to complete discovery by that date because we are still conducting document and ESI discovery. As such, the Parties have not yet scheduled any depositions. Thus, we respectfully request a six-month extension of the current deadlines, including but not limited to the discovery cut-off, to **August 29, 2025**.

In addition, the Parties respectfully request that the deadlines for expert discovery be extended as well. In following the current scheduling order (ECF 54), we propose the following schedule:

- Plaintiff's expert report(s) due May 30, 2025
- Defendant's expert report(s) due July 15, 2025
- All rebuttal expert report(s) due July 30, 2025

We respectfully request that all dispositive motions be due October 28, 2025. This is the Parties' first request for an extension of the discovery deadlines.

We thank the Court for its time and consideration of this matter.

Respectfully submitted,

A handwritten signature in blue ink that reads "Brooke Payton".

Brooke Payton